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Civil Division

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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

\_\_\_\_\_  
Innovation Law Lab, *et al.*,

Plaintiffs,

v.

Kirstjen Nielsen, *et al.*,

Defendants.  
\_\_\_\_\_

Civil Action No. 3:19-cv-0807-RS  
**DECLARATION OF  
ARCHITH RAMKUMAR**

1 I, Archith Ramkumar, declare:

2 1. I am a Trial Attorney at the Office of Immigration Litigation District Courts  
3 Section of the United States Department of Justice, and am assigned to represent Defendants in  
4 this action. The facts set forth in this declaration are within my personal knowledge or based on  
5 documents and information I have received in the course of this litigation in this case.  
6

7 2. Plaintiffs in this lawsuit are challenging the implementation of the Migrant  
8 Protection Protocols (“MPP”), *see* Complaint, Dkt No. 1, and, in their Motion for a Temporary  
9 Restraining Order (“TRO”) contend that certain documents relevant to the Individual Plaintiffs  
10 have not been filed. *See* Dkt. 20-1 at 6. Defendants seek to submit excerpts of the individual  
11 Plaintiffs’ Alien Files (“A-Files”) solely to advance Defendants’ jurisdictional arguments as well  
12 as to rebut the evidence submitted by Plaintiffs to show irreparable harm.  
13

14 3. Each A-File contains personal and confidential identifying information belonging  
15 to the individual Plaintiffs, and also catalogues interviews conducted by the Department of  
16 Homeland Security and asylum officers of the individual Plaintiffs. These interviews also  
17 contain sensitive, protected identifying information.  
18

19 4. In addition, the individual Plaintiffs are proceeding in this lawsuit  
20 pseudonymously, *see* Dkt. 4. It is therefore is necessary to file the A-Files under seal to remain  
21 consistent with Plaintiffs’ motion to proceed pseudonymously. As such, the A-Files that are the  
22 subject of this motion are replete with information that must be protected from public disclosure.  
23

24 5. Plaintiffs’ Counsel agrees that the information contained in the excerpts of the A-  
25 Files should be protected from disclosure and filed under seal.  
26  
27  
28

1 I declare under penalty of perjury that the following declaration is true and correct.

2 Executed at Washington, D.C. on March 1, 2019.

3 /s/ Archith Ramkumar  
4 ARCHITH RAMKUMAR  
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